

1 PAUL J. PASCUZZI, State Bar No. 148810  
JASON E. RIOS, State Bar No. 190086  
2 THOMAS R. PHINNEY, State Bar No. 159435  
FELDERSTEIN FITZGERALD  
3 WILLOUGHBY PASCUZZI & RIOS LLP  
500 Capitol Mall, Suite 2250  
4 Sacramento, CA 95814  
Telephone: (916) 329-7400  
5 Facsimile: (916) 329-7435  
Email: ppascuzzi@ffwplaw.com  
6 jrios@ffwplaw.com  
7 tphinney@ffwplaw.com

8 ORI KATZ, State Bar No. 209561  
ALAN H. MARTIN, State Bar No. 132301  
9 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
A Limited Liability Partnership  
Including Professional Corporations  
10 Four Embarcadero Center, 17<sup>th</sup> Floor  
San Francisco, California 94111-4109  
11 Telephone: (415) 434-9100  
Facsimile: (415) 434-3947  
12 Email: okatz@sheppardmullin.com  
13 amartin@sheppardmullin.com

14 Attorneys for The Roman Catholic Archbishop of  
San Francisco

15 UNITED STATES BANKRUPTCY COURT  
16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION  
17

18 In re  
19 THE ROMAN CATHOLIC ARCHBISHOP  
20 OF SAN FRANCISCO,

21 Debtor and  
22 Debtor in Possession.  
23  
24  
25  
26  
27  
28

Case No. 23-30564

Chapter 11

**DECLARATION OF PAUL H. DEUTCH IN  
SUPPORT OF FIRST INTERIM  
APPLICATION OF OMNI AGENT  
SOLUTIONS, INC. FOR ALLOWANCE OF  
FEES AND REIMBURSEMENT OF  
EXPENSES AS ADMINISTRATIVE AGENT  
FOR THE DEBTOR IN POSSESSION**

Date: April 4, 2024  
Time: 1:30 p.m.  
Location: Via ZoomGov  
Judge: Hon. Dennis Montali

1 I, Paul H. Deutch, declare under the penalty of perjury that:

2 1. I am the Executive Vice President of Omni Agent Solutions ("Omni"), which serves as  
3 administrative agent to the debtor and debtor in possession (the "Debtor").

4 2. I am familiar with the work performed by Omni on behalf of the Debtor.

5 3. I have reviewed the foregoing First Interim Application of Omni Agent Solutions, Inc.,  
6 for Allowance of Fees and Reimbursement of Expenses as Administrative Agent for the Debtor (the  
7 "Application"), and to the best of my knowledge, all statements are true and correct.

8 4. I certify that to the best of my knowledge FFWPR has complied with the U.S. Trustee's  
9 guidelines ("U.S. Trustee Guidelines").

10 5. I certify that: (a) I have read the Application; (b) to the best of my knowledge,  
11 information and belief, formed after reasonable inquiry, the compensation and expense reimbursement  
12 sought is in conformity with the Court Guidelines, except as may be specifically noted in the  
13 Application or this Declaration; and (c) the compensation and expense reimbursement requested are  
14 billed at rates, in accordance with practices, generally accepted by the my firm's clients.

15 I declare under penalty of perjury under the laws of the United States of America that the  
16 foregoing is true and correct. Executed on February 19, at New York, New York.

17  
18   
19 PAUL H. DEUTCH

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Exhibit A

August 21, 2023, to December 31, 2023, Invoices



**Omni Agent Solutions, Inc.**  
5955 DeSoto Avenue, Suite #100  
Woodland Hills, CA 91367  
818-906-8300

October 18, 2023

327 -The Roman Catholic Archbishop of San Francisco

**Invoice Number: 12161**  
Invoice Period: 09-01-2023 - 09-30-2023

Payment Terms: Upon Receipt

**RE: Schedules & SOFAs**

## **Schedules & SOFAs**

### **Time Details**

<b>Date</b>	<b>Professional</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
09-11-2023	Sejal Kelly	Correspond with W. Weitz @ BRiley re upcoming schedules and SOFA deadline	0.20	240.00	48.00
09-12-2023	Brittney Whitaker	Conference call with S. Kelly @ Omni; W. Weitz, @ B Riley re schedules and sofas tracking sheets	1.10	240.00	264.00
09-12-2023	Sejal Kelly	Conference call with B. Whitaker @ Omni; W. Weitz, @ B Riley re schedules and sofas tracking sheets	1.10	240.00	264.00
09-12-2023	Brittney Whitaker	Calls with W. Weitz @ B Riley re service list and matrix	0.20	240.00	48.00
09-13-2023	Brittney Whitaker	Prepare Schedule of Assets and Liabilities	1.10	240.00	264.00
09-13-2023	Ashley Stefanovic	Prepare Schedule of Assets and Liabilities	1.10	125.00	137.50
09-14-2023	Brittney Whitaker	Prepare Statement of Financial Affairs	0.50	240.00	120.00
09-14-2023	Javon Couch	Prepare Statement of Financial Affairs	1.70	170.00	289.00
09-14-2023	Brittney Whitaker	Perform quality assurance on Schedules and SOFA data files	0.60	240.00	144.00

Invoice Number: 12161

We appreciate your business

Page 2 of 9

Date	Professional	Description	Hours	Rate	Amount
09-14-2023	Tara Saldajeno	Prepare Schedule of Assets and Liabilities	2.40	160.00	384.00
09-14-2023	Tara Saldajeno	Perform quality assurance on Schedules and SOFA documents and exhibits	0.30	160.00	48.00
09-14-2023	Tara Saldajeno	Perform quality assurance on Schedules and SOFA data files	0.70	160.00	112.00
09-15-2023	Brittney Whitaker	Perform quality assurance on Schedules and SOFA data files	3.30	240.00	792.00
09-15-2023	Brittney Whitaker	Perform quality assurance on Statement of Financial Affairs	1.40	240.00	336.00
09-15-2023	Ashley Stefanovic	Prepare Statement of Financial Affairs	0.80	125.00	100.00
09-15-2023	Tara Saldajeno	Prepare Schedule of Assets and Liabilities	1.90	160.00	304.00
09-15-2023	Brittney Whitaker	Review e-mail received and respond to W. Weitz @ B Riley re Schedules and SOFAs files	0.20	240.00	48.00
09-15-2023	Yelena Bederman	Review e-mail received and respond to B. Whitaker re: schedules	0.10	190.00	19.00
09-15-2023	Yelena Bederman	Prepare Schedule of Assets and Liabilities	2.00	190.00	380.00
09-15-2023	Yelena Bederman	Coordinate preparation of load files for schedules	0.50	190.00	95.00
09-15-2023	Javon Couch	Prepare Statement of Financial Affairs	1.30	170.00	221.00
09-15-2023	Karen Graves	Perform quality assurance on Schedules and SOFA data files	0.50	145.00	72.50
09-15-2023	Anthony Roque	Prepare Schedule of Assets and Liabilities	2.50	140.00	350.00
09-15-2023	Noah Hurst	Prepare Schedule of Assets and Liabilities	1.60	165.00	264.00
09-15-2023	Lyanne Ramirez	Prepare Schedule of Assets and Liabilities	1.30	135.00	175.50
09-15-2023	Carrie Hernandez	Perform quality assurance on Schedules and SOFA data files	1.10	180.00	198.00

Invoice Number: 12161

We appreciate your business

Page 3 of 9

Date	Professional	Description	Hours	Rate	Amount
09-15-2023	Ada Ferrer	Perform quality assurance on Schedules and SOFA data files	0.60	200.00	120.00
09-16-2023	Ada Ferrer	Perform quality assurance on Schedules and SOFA data files	0.80	200.00	160.00
09-16-2023	Yelena Bederman	Prepare Schedule of Assets and Liabilities	0.20	190.00	38.00
09-16-2023	Yelena Bederman	Prepare schedules & SOFAs drafts	0.10	190.00	19.00
09-16-2023	Anthony Roque	Prepare Schedule of Assets and Liabilities	0.40	140.00	56.00
09-16-2023	Lyanne Ramirez	Prepare Statement of Financial Affairs	1.10	135.00	148.50
09-16-2023	Javon Couch	Prepare Statement of Financial Affairs	0.70	170.00	119.00
09-16-2023	Ashley Stefanovic	Prepare Statement of Financial Affairs	0.90	125.00	112.50
09-16-2023	Tara Saldajeno	Prepare Statement of Financial Affairs	3.40	160.00	544.00
09-16-2023	Brittney Whitaker	Perform quality assurance on Statement of Financial Affairs	0.60	240.00	144.00
09-17-2023	Sejal Kelly	Perform quality assurance on Schedules and SOFA documents and exhibits	3.40	240.00	816.00
09-17-2023	Yelena Bederman	Prepare Schedule of Assets and Liabilities	0.30	190.00	57.00
09-17-2023	Yelena Bederman	Prepare schedules & SOFAs drafts	0.10	190.00	19.00
09-18-2023	Sejal Kelly	Call with W. Weitz @ B Riley and B. Whitaker @ Omni re Schedule and SOFAs updates	0.20	240.00	48.00
09-18-2023	Brittney Whitaker	Call with W. Weitz @ B Riley and S. Kelly @ Omni re Schedule and SOFAs updates	0.20	240.00	48.00
09-18-2023	Luis Solorzano	Perform quality assurance on Schedules and SOFA documents and exhibits	0.50	240.00	120.00

Date	Professional	Description	Hours	Rate	Amount
09-18-2023	Sejal Kelly	Perform quality assurance on Schedules and SOFA data files	1.80	240.00	432.00
09-19-2023	Sejal Kelly	Call with W. Weitz @ BR re Schedules and SOFA discussion	0.10	240.00	24.00
09-19-2023	Sejal Kelly	Perform quality assurance on Schedules and SOFA documents and exhibits	2.70	240.00	648.00
09-19-2023	Sejal Kelly	Review emails/attachments received from client re: updates to schedules and SOFA	0.60	240.00	144.00
09-19-2023	Sejal Kelly	Review e-mail received and respond to W. Weitz @ BR re updates to schedules and SOFA	0.40	240.00	96.00
09-19-2023	Luis Solorzano	Perform quality assurance on Schedules and SOFA documents and exhibits	2.80	240.00	672.00
09-19-2023	Brittney Whitaker	Perform quality assurance on Schedules and SOFA data files	1.40	240.00	336.00
09-20-2023	Brittney Whitaker	Review e-mail received and respond to W. Weitz @ B Riley re (.2) SOFA drafts. (.2) SOFA 7 exhibit	0.40	240.00	96.00
09-20-2023	Brittney Whitaker	Review e-mail received and respond to W. Weitz @ B Riley re revised exhibits for Schedule F and SOFA 7	0.20	240.00	48.00
09-20-2023	Brittney Whitaker	Prepare Statement of Financial Affairs	0.60	240.00	144.00
09-20-2023	Brittney Whitaker	Prepare Schedule of Assets and Liabilities	0.80	240.00	192.00
09-20-2023	Brittney Whitaker	Perform quality assurance on Statement of Financial Affairs	2.20	240.00	528.00
09-20-2023	Brittney Whitaker	Perform quality assurance on Schedules and SOFA documents and exhibits	0.70	240.00	168.00
09-20-2023	Brittney Whitaker	Perform quality assurance on Schedules data files	1.40	240.00	336.00
09-20-2023	Sejal Kelly	Calls with B. Whitaker re Schedule and SOFAs revisions	1.40	240.00	336.00
09-20-2023	Sejal Kelly	Conference call with B. Whitaker @ Omni; W. Weitz @ B. Riley re Schedules and SOFA page turn	0.60	240.00	144.00

Invoice Number: 12161

We appreciate your business

Page 5 of 9

<b>Date</b>	<b>Professional</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
09-20-2023	Brittney Whitaker	Conference call with S. Kelly @ Omni; W. Weitz @ B. Riley re Schedules and SOFA page turn	0.60	240.00	144.00
09-20-2023	Yelena Bederman	Prepare Schedule of Assets and Liabilities	1.00	190.00	190.00
09-20-2023	Yelena Bederman	Review e-mail received and respond to B. Whitaker re: drafts	0.10	190.00	19.00
09-20-2023	Javon Couch	Prepare Statement of Financial Affairs	1.20	170.00	204.00
09-20-2023	Javon Couch	Prepare Schedule of Assets and Liabilities	1.30	170.00	221.00
09-20-2023	Ada Ferrer	Perform quality assurance on Schedules and SOFA data files	2.00	200.00	400.00
09-20-2023	Brittney Whitaker	Calls with S. Kelly re Schedule and SOFAs revisions	1.40	240.00	336.00
09-20-2023	Yelena Bederman	Prepare Statement of Financial Affairs	0.10	190.00	19.00
09-20-2023	Yelena Bederman	Prepare schedules and SOFAs drafts	0.20	190.00	38.00
09-20-2023	Yelena Bederman	Review e-mail received and respond to B. Whitaker & J. Couch re: schedule H	0.10	190.00	19.00
09-20-2023	Tara Saldajeno	Prepare Statement of Financial Affairs	1.50	160.00	240.00
09-20-2023	Yelena Bederman	Review e-mail received and respond to B. Whitaker re: updates to schedule EF	0.10	190.00	19.00
09-20-2023	Michelle Ignacio	Prepare Schedule AB changes requested to add Headers for Q 76	0.50	155.00	77.50
09-20-2023	Luis Solorzano	Perform quality assurance on Schedules and SOFA documents and exhibits	2.30	240.00	552.00
09-20-2023	Lyanne Ramirez	Prepare Statement of Financial Affairs	0.60	135.00	81.00
09-20-2023	Sejal Kelly	Prepare Schedule of Assets and Liabilities	3.60	240.00	864.00
09-20-2023	Sejal Kelly	Prepare Statement of Financial Affairs	2.40	240.00	576.00

Invoice Number: 12161

We appreciate your business

Page 6 of 9



<b>Date</b>	<b>Professional</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
09-20-2023	Brittney Whitaker	Calls with W. Weitz @ B Riley re revisions to Schedules and SOFAs	0.60	240.00	144.00
09-21-2023	Javon Couch	Review SOAL & SOFA exhibits and load to ShareVault	0.20	170.00	34.00
09-21-2023	Brittney Whitaker	Calls with S. Kelly re Schedule and SOFAs revisions	0.40	240.00	96.00
09-21-2023	Sejal Kelly	Calls with W Weitz @ BR re updates to schedules and SOFA	0.20	240.00	48.00
09-21-2023	Sejal Kelly	Perform quality assurance on Schedules and SOFA documents and exhibits	6.20	240.00	1,488.00
09-21-2023	Sejal Kelly	Calls with W. Weitz @ BR re changes to schedules and status updates	1.10	240.00	264.00
09-21-2023	Tara Saldajeno	Perform quality assurance on Schedules and SOFA documents and exhibits	0.80	160.00	128.00
09-21-2023	Yelena Bederman	Review e-mail received and respond to S. Kelly re: signature pages	0.10	190.00	19.00
09-21-2023	Yelena Bederman	Prepare signature pages	0.10	190.00	19.00
09-21-2023	Yelena Bederman	Review e-mail received and respond to S. Kelly re: schedule F exhibit	0.10	190.00	19.00
09-21-2023	Yelena Bederman	Prepare Schedule of Assets and Liabilities	0.50	190.00	95.00
09-21-2023	Michelle Ignacio	Prepare SofA & Schedule EF changes requested	0.70	155.00	108.50
09-21-2023	Yelena Bederman	Review e-mail received and respond to B. Whitaker re: unredacted schedules	0.10	190.00	19.00
09-21-2023	Yelena Bederman	Prepare unredacted version of schedules	0.30	190.00	57.00
09-21-2023	Brittney Whitaker	Perform quality assurance on Statement of Financial Affairs	0.50	240.00	120.00
09-21-2023	Sejal Kelly	Calls with B. Whitaker re Schedule and SOFAs revisions	0.40	240.00	96.00

Invoice Number: 12161

We appreciate your business

Page 7 of 9

Date	Professional	Description	Hours	Rate	Amount
09-22-2023	Luis Solorzano	Perform quality assurance on Schedules and SOFA data files	0.80	240.00	192.00

**Total** 19,336.50

### Time Summary

Professional	Hours	Rate	Amount
Ada Ferrer	3.40	200.00	680.00
Anthony Roque	2.90	140.00	406.00
Ashley Stefanovic	2.80	125.00	350.00
Brittney Whitaker	20.40	240.00	4,896.00
Carrie Hernandez	1.10	180.00	198.00
Javon Couch	6.40	170.00	1,088.00
Karen Graves	0.50	145.00	72.50
Luis Solorzano	6.40	240.00	1,536.00
Lyanne Ramirez	3.00	135.00	405.00
Michelle Ignacio	1.20	155.00	186.00
Noah Hurst	1.60	165.00	264.00
Sejal Kelly	26.40	240.00	6,336.00
Tara Saldajeno	11.00	160.00	1,760.00
Yelena Bederman	6.10	190.00	1,159.00
<b>Total</b>			19,336.50

<b>Subtotal for this Invoice</b>	19,336.50
<b>Discount</b>	(1,933.65)
<b>Total for this Invoice</b>	17,402.85
<b>Previous Balance</b>	0.00
<b>Total Amount to Pay</b>	17,402.85



**Omni Agent Solutions, Inc.**  
5955 DeSoto Avenue, Suite #100  
Woodland Hills, CA 91367  
818-906-8300

January 17, 2024

327 -The Roman Catholic Archbishop of San Francisco

**Invoice Number: 12407**

Invoice Period: 12-01-2023 - 12-31-2023

Payment Terms: Upon Receipt

**RE: Schedules & SOFAs**

## **Schedules & SOFAs**

### **Time Details**

<b>Date</b>	<b>Professional</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
12-06-2023	Sejal Kelly	Review e-mail received and respond to W. Weitz @ BRiley re amending of schedules and SOFAs	0.20	240.00	48.00
12-07-2023	Sejal Kelly	Call with W. Weitz and T. Andersen @ BRiley re amendments to schedules and statements	0.40	240.00	96.00
12-07-2023	Sejal Kelly	Coordinate and supervise amendments to schedules and SOFAs	0.40	240.00	96.00
12-07-2023	Sejal Kelly	Perform quality assurance review of Schedules and SOFAs	0.50	240.00	120.00
12-07-2023	Mark Bishay	Work on amended SOFA form	0.30	155.00	46.50
12-07-2023	Luis Solorzano	Perform quality assurance on Schedules and SOFA documents and exhibits	1.30	240.00	312.00
12-07-2023	Luis Solorzano	Prepare for and call with S. Kelly @Omni and T. Anderson and W. Weitz @Briley Financial re amendments to Schedules and SOFAs	1.50	240.00	360.00
12-07-2023	Tara Saldajeno	Download secured files from the FTP website re:	0.20	160.00	32.00

Invoice Number: 12407

We appreciate your business

Page 2 of 5

Date	Professional	Description	Hours	Rate	Amount
		Amended SOAL & SOFA data			
12-07-2023	Yelena Bederman	Process amendments to schedules and SOFAs	2.50	190.00	475.00
12-07-2023	Yelena Bederman	Review e-mail received and respond to S. Kelly re: amendments to schedules & SOFAs	0.10	190.00	19.00
12-10-2023	Sejal Kelly	Perform quality assurance on Schedules and SOFA documents and exhibits	2.00	240.00	480.00
12-11-2023	Brittney Whitaker	Prepare Schedule of Assets and Liabilities; redline of changes made to redacted version	4.50	240.00	1,080.00
12-11-2023	Tara Saldajeno	Upload amended Schedules and SOFA files to the secure FTP website	0.20	160.00	32.00
12-11-2023	Brittney Whitaker	Perform quality assurance on Schedules and SOFA data files	1.40	240.00	336.00
12-11-2023	Brittney Whitaker	Call with T. Anderson and W. Weitz @ B Riley re schedule amendments	0.20	240.00	48.00
12-11-2023	Brittney Whitaker	Review e-mail received and respond to W. Weitz @ B Riley re updates to the Schedules and SOFAs	0.20	240.00	48.00
12-11-2023	Brittney Whitaker	Review e-mail received and respond to W. Weitz and T. Anderson @ B Riley re schedule and sofa draft	0.20	240.00	48.00
12-11-2023	Brittney Whitaker	Call with T. Anderson @ B Riley re amendments for Schedules	0.20	240.00	48.00
12-11-2023	Brittney Whitaker	Prepare Schedule of Assets and Liabilities; redline of changes made to unredacted version	3.40	240.00	816.00
12-11-2023	Caroline Zemp	Perform quality assurance on Schedules and SOFA documents and exhibits	2.00	170.00	340.00
12-11-2023	Yelena Bederman	Prepare amended schedules & SOFAs	1.50	190.00	285.00
12-13-2023	Brittney Whitaker	Prepare Schedule of Assets and Liabilities	2.30	240.00	552.00
12-13-2023	Brittney Whitaker	Prepare Schedule of Assets and Liabilities; redline of changes made to redacted version	1.40	240.00	336.00

Invoice Number: 12407

We appreciate your business

Page 3 of 5

Date	Professional	Description	Hours	Rate	Amount
12-13-2023	Brittney Whitaker	Prepare Schedule of Assets and Liabilities; redline of changes made to unredacted version	1.30	240.00	312.00
12-13-2023	Brittney Whitaker	Review e-mail received and respond to W. Weitz @ B Riley re additions for Schedule F	0.20	240.00	48.00
12-13-2023	Yelena Bederman	Review e-mail received and respond to B. Whitaker re: updates to schedule F	0.10	190.00	19.00
12-13-2023	Yelena Bederman	Prepare amended Schedule of Assets and Liabilities	0.10	190.00	19.00
12-13-2023	Yelena Bederman	Prepare drafts for amended schedules & SOFAs	0.50	190.00	95.00
12-14-2023	Tara Saldajeno	Upload amended Schedule and SOFA documents to FTP website	0.20	160.00	32.00
<b>Total</b>					6,578.50

### Time Summary

Professional	Hours	Rate	Amount
Brittney Whitaker	15.30	240.00	3,672.00
Caroline Zemp	2.00	170.00	340.00
Luis Solorzano	2.80	240.00	672.00
Mark Bishay	0.30	155.00	46.50
Sejal Kelly	3.50	240.00	840.00
Tara Saldajeno	0.60	160.00	96.00
Yelena Bederman	4.80	190.00	912.00
<b>Total</b>			6,578.50

<b>Subtotal for this Invoice</b>	6,578.50
<b>Discount</b>	(657.85)
<b>Total for this Invoice</b>	5,920.65
<b>Previous Balance</b>	3,480.57
<b>Total Amount to Pay</b>	9,401.22